

EXHIBIT 24

Deposition Excerpts of Darla Welker

Holliman, Michelle v. We Are Sharing Hope SC, et al

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STATE OF SOUTH CAROLINA COURT OF COMMON PLEAS
COUNTY OF CHARLESTON 9TH JUDICIAL CIRCUIT
MICHELLE CHA HOLLIMAN, individually and as personal
representative of the Estate of Allen B. Holliman,

Plaintiff,

vs. CASE NO. 2020-CP-10-2902

WE ARE SHARING HOPE SC, MEDICAL UNIVERSITY OF SOUTH
CAROLINA, and UNITED NETWORK FOR ORGAN SHARING,
Defendants.

VIDEOCONFERENCE

DEPOSITION OF: DARLA A. WELKER

DATE: December 14, 2020

TIME: 10:04 a.m.

LOCATION: Mount Pleasant, South Carolina

TAKEN BY: Counsel for the Plaintiff

REPORTED BY: MARIE H. BRUEGGER, RPR, CRR
(Appearing Via VTC)

1 A No. And there would have been -- at
2 different times when the case starts, there are
3 other clinicians on. Michael was on that
4 particular day.

5 Q For the donor at issue in this case?

6 A Yes, for the donor the day that the
7 blood type was typed as well as for the OR and the
8 recovery in the OR.

9 Q So would it have been his role to
10 review the medical records of the donor at issue
11 in this case?

12 A Yes.

13 Q Are you responsible for approving the
14 blood type reported for donors that you're working
15 on?

16 A Yes.

17 Q And what do you do in order to approve
18 a blood type reported for a donor?

19 A Again, I look at the two samples that
20 are drawn at VRL to compare those two, and if
21 they're the same blood type, then we would report
22 those and verify those two ABOs as the reported
23 case of what the -- that's the normal practice.
24 So those two blood types match, they have the --
25 it's the right donor, the right -- the right VRL

1 that the donor received blood transfusions,
2 correct?

3 MS. CRAIG: Same objection.

4 THE WITNESS: Any coordinator that was
5 on site to review the case, yes, would have known
6 that, should have known that.

7 BY MS. DINKINS:

8 Q Were there any other coordinators on
9 site for this donor who should have known that?

10 A There were. There had to have been
11 other coordinators. I don't recall who was on the
12 case from the start before Michael.

13 Q Were you responsible for approving the
14 blood type reported for this donor?

15 A Yes.

16 Q And so did you approve reporting this
17 donor as having blood type O?

18 A I did.

19 Q How did you communicate your approval
20 of this donor's blood type?

21 A How did we verify? Is that the
22 question?

23 Q Well, my first question was a little
24 more technical. How did you communicate it? So
25 did you do this over writing? Over the phone?

1 and --

2 Q And what -- excuse me.

3 A And hemodiluted is clotted, so it
4 could be a bad sample that was drawn. I didn't
5 know at the time.

6 Q Did you look into why the VRL results
7 were indeterminate?

8 A No, not after we found --

9 Q Why not?

10 A Not after we found two samples that
11 were both resulted as an O from the hospital.

12 Q Do you think you should have looked
13 into why the VRL results came back indeterminate?

14 MS. CRAIG: Objection.

15 THE WITNESS: Perhaps in hindsight,
16 yes.

17 BY MS. DINKINS:

18 Q What can cause blood samples to be
19 hemodiluted?

20 A Depends on -- if the patient is
21 coagulopathic at the time, the sample can clot.

22 Q What does that mean, to be
23 coagulopathic?

24 A That means the patient is clotting too
25 fast. Their blood is clotting fast.

1 Q I'm not asking about for a particular
2 donor; I'm asking if that's something that can
3 affect the accuracy of blood typing results.

4 MS. CRAIG: And objection. Asked and
5 answered.

6 THE WITNESS: I'm uncomfortable
7 answering that question because I don't know -- I
8 don't know certainly. I don't know.

9 BY MS. DINKINS:

10 Q You don't know whether hemodilution
11 can affect the accuracy of blood typing results?

12 A I don't know, no, I don't know. I'm
13 not a blood specialist. I really don't know.

14 Q Do you expect anyone else besides WASH
15 will confirm a donor's blood type before the
16 donor's organs are removed?

17 A Ask that question in a different
18 manner.

19 Q Is there anyone besides WASH that you
20 expect will confirm a donor's blood type before
21 the donor's organs are procured?

22 A It happens, yes. Some transplant
23 centers do a confirmatory ABO prior to
24 transplantation.

25 Q And how do transplant centers do that?